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Attorneys for Defendant TwinStar Credit Union

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON PORTLAND DIVISION

HUDSON INSURANCE COMPANY, a Delaware corporation,

Plaintiff.

v.

ROMAN MOTORS LLC, an Oregon limited liability company; DAMON SLOAN, an individual; BRANDON SLOAN, an individual; TWINSTAR CREDIT UNION, a Washington corporation; CROSS POINT NW LLC, an Oregon limited liability company; SELCO COMMUNITY CREDIT UNION, an Oregon corporation; VEHICLE ACCEPTANCE CORPORATION, a Texas corporation; MANHEIM REMARKETING, INC. abn MANHEIM PORTLAND, a Delaware corporation; and ASHLEY MCCALPIN, an individual.

Defendants.

Case No. 3:16-cv-01831-YY

STIPULATION FOR ORDER TO WITHDRAW AND DISBURSE FUNDS

Pursuant to plaintiff's Tender of Bond Proceeds (Dkt. 13) in the sum of \$40,000, and its agreed limit of attorney fees to \$2,000, for a net sum available to claimants of \$38,000, which sum is currently on deposit with the Court, plaintiff and each of the undersigned claimant defendants who have appeared and made a claim to the bond proceeds, stipulate to the following

proposed withdrawal and distribution of funds, the agreed distribution being proportional to each claim and taking into account the limitation of ORS 822.030(3):

<u>Claimant</u>	Address to Mail Payment	Amount
Vehicle Acceptance Corporation	c/o Robert C. Dougherty Law Offices of Robert C. Dougherty 1130 SW Morrison Street, Suite 210 Portland, OR 97205	\$ 1,603.47
ADESA Oregon, LLC	c/o Robert C. Dougherty Law Offices of Robert C. Dougherty 1130 SW Morrison Street, Suite 210 Portland, OR 97205	\$965.07
SELCO Community Credit Union	c/o Eric J. Kiley SELCO Community Credit Union PO Box 7487 Springfield, OR 97475	\$6,587.47
TwinStar Credit Union	c/o James P. Laurick Kilmer, Voorhees & Laurick 732 NW 19th Avenue Portland, OR 97209	\$9,510.66
Ashley McCalpin	c/o Young W. Walgenkim Hanson & Walgenkim, LLC 838 Commercial St NE Salem, OR 97301	\$11,078
Marcus Bolivar	c/o Jordan M. Roberts Roberts Law Group 520 SW Yamhill, Suite 208 Portland, OR 97204	\$8,255.33
Totals		<u>\$38,000.00</u>

STIPULATED BY:

/s/ Mario R. Nicholas Date: 1/20/17

Mario R. Nicholas, OSB No. 141663 Attorney for Plaintiff Hudson Insurance Company /s/ James P. Laurick Date: 1/20/17

James P. Laurick, OSB No. 821530

Attorney for Defendant TwinStar Credit Union

/s/ Eric J. Kiley Date: 1/20/17

Eric J. Kiley, OSB No. 025802

Attorney for Defendant Selco Community

Credit Union

/s/ Robert C. Dougherty Date: 1/19/17

Robert C. Dougherty, OSB No. 872078 Attorney for Defendants Vehicle Acceptance Corporation & ADESA Oregon, LLC

/s/ Young W. Walgenkim Date: 1/20/17

Young W. Walgenkim, OSB No. 124900

Attorney for Ashley McCalpin

/s/ Jordan M. Roberts Date: 1/20/17

Jordan M. Roberts, OSB No. 115010 Attorney for Marcus Bolivar

CERTIFICATE OF SERVICE

I certify that on this 20th day of January, 2017, the foregoing **STIPULATION FOR ORDER TO WITHDRAW AND DISBURSE FUNDS** will be served in accordance with the Court's CM/ECF system which will send notification of such filing by notice via email to the ECF participants of record a true copy of the foregoing document.

KILMER VOORHEES & LAURICK, P.C.

/s/ James P. Laurick

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Of Attorneys for Defendant TwinStar Credit Union I:\10250\0004\Pleadings\Stip for Order to Withdraw & Disburse Funds.docx